



Perry Johnson Laboratory Accreditation, Inc.



December 20, 2013

Mr. Joseph Theile, Management Analyst
Nevada Division of Public and Behavioral Health
Medical Marijuana Program
4150 Technology Way
Carson City, NV 89706-2009

Dear Mr. Theile:

This letter is in regards to the Nevada Medical Marijuana Regulations, in particular section 124. Currently it reads the following:

- 1. Each independent testing laboratory that claims to be accredited must provide the Division with copies of each annual inspection report from the accrediting organization, including, without limitation, any deficiencies identified in and any corrections made in response to the report.*
- 2. An independent testing laboratory may not claim to be accredited unless it is accredited by an accrediting organization that is nationally recognized and approved by the Division.*
- 3. Inspection by an accrediting organization is not a substitute for inspection by the Division.*

We would like to propose that the following be added to this section: *Independent Testing Laboratories must be accredited to ISO/IEC 17025:2005 by an international or national recognized accreditation body.*

By adding this above statement mandates that each laboratory obtains equivalent credentials. Additionally, stating the credentials of the accreditation body will also assure you that appropriate credentials for accrediting laboratories exist.

ISO/IEC 17025:2005-*General requirements for the competence of testing and calibration laboratories*, is a well-recognized international standard designed for testing and calibration facilities. This standard requires that laboratories have a sound quality management system and the appropriate capabilities to produce reliable and accurate test results. Many governmental and regulatory bodies have already adopted this standard as part of their specific programs. This includes but not limited to: The Consumer Product Safety Commission (CPC), Nuclear Regulatory Commission, Department of Defense (DoD), Food and Drug Administration (FDA) and the Environmental Protection Agency (EPA). Additionally, other states with similar marijuana testing requirements have already embedded this requirement and by the suggested statement will allow the state of Nevada to be consistent with other state regulations.

We thank you for your attention to this matter. If you need any further information, please feel free to contact me directly.

Sincerely,

Tracy Szerszen, President/Operations Manager
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